Message

From: Minter, Douglas [Minter.Douglas@epa.gov]

Sent: 11/20/2014 4:40:33 PM

To: Hoskie, Sadie [Hoskie.Sadie@epa.gov]

Subject: RE: Request for a paragraph on Financial Assurance

Sure...here you go:

Securing the financial resources from an applicant to plug and abandon injection wells is an essential part of the UIC permitting process. Through various financial instruments (e.g., surety bond), EPA expects that companies meet the UIC FR requirements in 40 CFR 144.52(a)(7) prior to final permit issuance, and preferably before EPA public notices the draft permit for comment.

I can stop by later this morning to discuss work sharing ideas, etc. I recently discussed at least one longer term option with Diane as our Unit currently has no financial expertise.

On another topic, did we need to discuss the draft email I sent you with the DB Class III docs before you send it on to Ron B? I am hoping we can have them begin their review asap.

----Original Message----

From: Hoskie, Sadie

Sent: Thursday, November 20, 2014 8:11 AM

To: Minter, Douglas

Subject: Request for a paragraph on Financial Assurance

Good morning Douglas. I am wondering if you can give me a short blurb on financial assurances - I know ECEJ does these for us and they are trying to get a backfill, but they would like to have a short description on what this means for our permitting program. They have also asked for our support to request a shared fte. Do you think that is do-able? Do we have enough separate work in the FA area? Why don't we discuss further this morning if you have time. But I do need the blurb asap. Thanks Douglas.

Sent from my iPhone